UPPER ROCKAWAY RIVER
WATERSHED ASSOCIATION

August 7, 1979

Richard A. Baker, Chief
Permits Administration Branch
Planning & Management Branch
EPA, Region II
26 Federal Plaza
New York, New York 10007

Re: L. E. Carpenter & Company
NPDES Permit # NJ0003611

Dear Dr. Baker:

We have a number of questions and comments pertaining to L. E. Carpenter's NPDES Permit Renewal Application and Draft Renewal Permit.

The fact that the Rockaway Valley Regional Sewer Authority has rerouted its sewer interceptor to avoid the L. E. Carpenter property indicates the severity of the pollution problem on that site. Water phase samples #1 and #2, Killam Associates, Inc., January 4, 1979, indicates xylene levels of 200,000 ppb. Xylene levels of 100 ppb concentration were found 3/4 mile downstream of the L. E. Carpenter site (Century Labs, Thoroughfare, N. J.).

L. E. Carpenter Permit Application (pageI-2) states that they serve 240 people with sanitary services at a total rate of 2,000 gallons per day (page I-3). A per person rate of 8 1/3 gallons is an unrealistically low estimate, normal requirements in this area for type of industry would indicate a figure of 30 gallons per person per day would be more realistic, for a total of 7,200 gallons per day. A check of the water purchases by L. E. Carpenter would seem appropriate. This information should be requested from the applicant.

Three discharges are listed for the permit: 001, non-contact cooling water from the printing operation; 002, non-contact cooling water from the coating operation; and 003, boiler blowdown. There are additional pipes. We would like to know what each pipe is used for. If permits are not issued for them, they should be removed.

In the application, Question #3, page II-1 and Question #14

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page II-3 for outfalls 001, 002 and 003: Why are the engineering reports and the activities causing discharges "not applicable"? A complete description should be required for every pipe emptying into drinking water.

In the application, Question #12, page II-2: Why were the questions not answered? For discharges 001 and 002 is it presumed that the flows are uniform? For 003 we assume that by necessity, the flow must be non-uniform. We request that the blowdown time be documented as well as the peak flow rate.

On page II-5, of the application, Question #16: The waste water characteristics are not listed for 001 and 002. However, page 2 of the Draft Renewal Permit sets forth a table of effluent characteristics and limitations for these outfalls. How was this data established when there is no information on the application?

Petroleum Hydrocarbons	10 mg/l	(daily max.)
Suspended Solids	20 mg/l	(daily max.)
Temperature	90 degrees F.	(daily max.)
Zinc	1 mg/l	(daily max.)
Chromium	0.5 mg/l	(daily max.)
Chemical Oxygen Demand	50 mg/l	(daily max.)

Chromium and Zinc listed in the table indicate that "a corrosion inhibitor containing this metal is used for water treatment purposes". Why are they not checked in the application? What is causing the chemical oxygen demand? What is the makeup of the suspended solids? Why are hydrocarbons in the non-contact cooling water?

Question #16, page II-5, for 003: Fourteen constituents in the discharge are listed, but not the quantities. Of the list of parameters, why is Zinc alone included in the permit?

Question #19, page II-7, for 003: States that no water treatment chemicals are added. We cannot imagine that L. E. Carpenter does not treat their boiler water. It is noted that Question #16, page II-5 indicates that treatment occurs. We would like to have an indication of the quantities involved. On page II-9, there is a list of five (5) formulas for boiler treatment. The permit should state exactly what those chemicals are.

The application notes that the discharge temperature of outfall 003 is 100°F, presumably after cooling through dilution. It is our understanding that a limit of 5°F rise above ambient is the limit applicable to an FW-2 stream under Section 208 of the Act. Furthermore, why does the Draft Permit allow a discharge of 100°F into

water which is 35°F in the winter and 65°F in the summer, thereby giving an increase in water temperature of 65°F and 35°F respectively.

The January 17, 1979, letter of R. Baker to H. Jarrett, Plant Engineer of L. E. Carpenter, requesting oil and grease and suspended solids test data was apparently not answered. We are concerned with why a non-contact cooling discharge 002 should contain floating oil and grease.

The recent disclosures of ground and surface water contamination with hydrocarbons and the way it occurred indicates that the applicant has successfully avoided the protection afforded to the population by the permit system. The applicants method of disposing of liquid chemicals in leach pits along the river and into the aquifer, and solids in buried drums, indicates the extent of the violations.

We would appreciate being informed that there will be a hearing and where and when it will be held.

Very truly yours,

Mimi Schwarz

Mimi Schwarz
Executive Director

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